

From: Ahimsa Sumchai
To: SFPD, Commission (POL); AhimsaPorterSumchaiMD@Comcast.net
Subject: Requesting Public Comment Submission re: Officer Health & Safety Building 606 Hunters Point Shipyard - a Federal Superfund Site
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To: Sergeant Rachael Kilshaw and esteemed members

San Francisco Police Commission

I am requesting the opportunity to offer expert public comment in response to the agenda item on calendar for the Commission Hearing next Wednesday, December 19, 2018, regarding SFPD officer health and safety at Building 606 of the Hunters Point Shipyard - A Federal Superfund Site.

I was an elected member and founding chair of the Hunters Point Shipyard Radiological Subcommittee in 2000 and contributed to finalization and publication of the Historical Radiological Assessment. Additionally, I served actively from 1992 to 1997 as a physician specialist with the San Francisco Department of Public Health and in 1997 served as attending physician for the Palo Alto Veteran's Administration Persian Gulf, Agent Orange, Ionizing Radiation Registry after completing a two year post-doctoral fellowship in emergency medicine and aeromedical transport at Stanford University.

Additionally, I have served in a volunteer capacity as the Health and Environmental Science Editor of the SF Bayview Newspaper since 2000. I grew up in southeast San Francisco and my father - a career longshoreman - died prematurely of pulmonary asbestosis, an occupational exposure that triggered a class action lawsuit.

I am expert in interpretation of health surveillance data and environmental analytics at the Hunters Point Shipyard. While I have not seen the full report to be presented by the San Francisco Department of Public Health, based on press reviews I would like to offer the following testimony.

1. The San Francisco Department of Public Health cannot declare Building 606

free of risk to health and safety if lead levels in two faucets of the building were above federal allowable limits. This could arise to governmental fraud as it did in Flint, Michigan in 2014 where cost-cutting measures led to tainted drinking water from use of the Flint River as a water source. In 2015 tests by the EPA documented elevated lead levels in the water at residents homes. By 2016 over a dozen lawsuits had been filed and criminal charges were filed against 10 government employees including two city officials, water plant officials, lab workers, and a district water supervisor. In June of 2017, the Michigan Attorney General's Office announced several state officials were charged with involuntary manslaughter due to the outbreak of a waterborne infectious disease that killed 12 people.

2. DPH cannot state Parcel E of the Hunters Point Shipyard does not pose a risk to health and safety as it is a federal Superfund site. Adjacent to Parcel E is the Parcel E2 landfill itself is a federal Superfund site. Landfill gas monitoring documents methane gas in pockets at the landfill surface in explosive concentrations of 50% volume in air.

Superfund is a United States Federal Program and the common name for the Comprehensive Response, Compensation, and Liability Act of 1980 (CERCLA), designed to clean up sites contaminated with hazardous substances. The Hunters Point Shipyard has a hazard ranking score approaching 50, placing it at the top of the list of the most contaminated properties in the country.

3. The 2010 Civil Grand Jury report on the Hunters Point Shipyard documents the conflict of interest existing under Article 31 of the Health Code that allows the DPH Director to determine a formula for reimbursement of the department by Lennar Developers for earth moving activities, administrative oversight and consulting fees for Environmental Engineer Amy Brownell. While it is reassuring to know there has been a third party involved in the retesting of Building 606, allowing DPH to oversee the testing is similar to what occurred with the Tetra Tech scandal involving the collection of anomalous soil samples throughout the base. In 2012 Tetra Tech conducted an investigation of itself and concluded the collection of 2,500 fraudulent soil samples had been remedied. This proved to be false as the scandal now includes 28 buildings on the base and property transferred to the City and County of San Francisco in 2015, Amy Brownell, PE declared was safe.

4. New research brings heightened scrutiny to the use of outdated laboratory guidelines for clearing soil samples at the Hunters Point Shipyard. Research into the stochastic effects of low dose radiation exposure contradicts claims by

the US Navy and DPH that exposure to low-level radioactivity is safe. Human exposure to low-level cumulative radiation can be more damaging to human tissue and genetics than high-level acute exposures.

I would like to formally submit public comment in advance of the December 19, 2018 SFPD Commission Hearing and would like to be informed of the time and location of the hearing.

Ahimsa Porter Sumchai, MD

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